

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(Baltimore Division)**

RENEE L. MCCRAY

*

Plaintiff

*

v.

* Civil Action No. GLR-13-CV1518

WELLS FARGO BANK, N.A. *et al.*

*

Defendants

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**MOTION AND STIPULATION OF TIME TO RESPOND
TO PLAINTIFF'S SECOND AMENDED COMPLAINT**

Defendants, Wells Fargo Bank, N.A. ("Wells Fargo") and Federal Home Loan Mortgage Corporation ("Freddie Mac") and Charles R. Goldstein, Chapter 7 Bankruptcy Trustee for the Estate of Renee L. McCray (the "Trustee"), hereby Move and Stipulate and Agree that the time for Defendants to respond to the Plaintiff's Second Amended Complaint shall be extended to March 31, 2014.

The extension is requested for the following reasons:

1. On September 23, 2013 the Plaintiff, Renee Louise McCray ("McCray") filed a Chapter 13 Voluntary Bankruptcy Petition (US Bankruptcy Court for the District of Maryland (Baltimore) 13-26131).
2. On January 30, 2014 McCray filed a Motion to Convert Chapter 13 to Chapter 7.
3. On January 31, 2014 the US Bankruptcy Court entered an Order Converting McCray's Chapter 13 Case to a Chapter 7 Case on the Debtor's Request.

4. On January 31, 2014 Charles R. Goldstein was appointed Chapter 7 Bankruptcy Trustee in connection with McCray's Chapter 7 proceeding. The Notice of Chapter 7 Bankruptcy Case established a Meeting of Creditors to occur on March 12, 2014.

5. On January 24, 2014 this Court entered an Order, among other things, granting McCray's Motion to File Amended Complaint and granting in part and denying in part Wells Fargo and Freddie Mac's Motion to Dismiss.

6. Based on available information it appears to the Trustee that the surviving claims asserted in the Second Amended Complaint may be an asset of the bankruptcy estate. The Trustee is in the process of investigating the claims and the debtor's affairs, however, the meeting of creditor's is not scheduled to occur until March 12, 2014.

7. The Defendants and the Trustee believe it is appropriate to defer requiring the Defendants to respond to the Second Amended Complaint and defer the litigation until the Trustee has gathered additional information about the claims asserted in the Second Amended Complaint.

WHEREFORE, for all the above reasons, Defendants, Wells Fargo and Freddie Mac and the Chapter 7 Trustee stipulate and agree to extend the date for the Defendants to file a responsive pleading to the Second Amended Complaint up to and including March 31, 2014, and move the Court to approve such stipulation.

SO ORDERED ON THIS _____ DAY OF _____, 2014.

U.S. District Court for the District of Maryland

Stipulation and Request Submitted by:

/s/ Michael S. Barranco

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Attorney for Defendants,
Wells Fargo Bank, N.A.
Federal Home Loan Mortgage Corporation

*Charles R Goldstein (MSB-
with
permission
of
Mr. Goldstein
to sign
on his
behalf)*

Charles R. Goldstein
Chapter 7 Trustee for the Estate of Renee L.
McCray
1 East Pratt Street
Suite 800
Baltimore, Maryland 21202
Tel. (410) 454-6238
md-bank@protiviti.com

CERTIFICATE OF SERVICE

I hereby certify on this 7th day of February, 2014, that a copy of the foregoing Stipulation of Extension of Time to Respond to Second Amended Complaint was filed via CM/ECF and served by U.S. Mail, postage prepaid, first class to the following:

Renee L. McCray
109 Edgewood Street
Baltimore, Maryland 21229

/s/ Michael S. Barranco
Michael S. Barranco